

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Harrisonburg Division**

CONSUMER FINANCIAL PROTECTION
BUREAU; COMMONWEALTH OF
MASSACHUSETTS; THE PEOPLE OF
THE STATE OF NEW YORK, by LETITIA
JAMES, Attorney General of the State of New
York; and COMMONWEALTH OF
VIRGINIA, *EX REL.* MARK R. HERRING,
ATTORNEY GENERAL,

Case No. 5:21-cv-00016

Plaintiffs,

v.

NEXUS SERVICES, INC.; LIBRE BY NEXUS,
INC.; MICHEAL DONOVAN; RICHARD
MOORE, and EVAN AJIN,

Defendants.

MOTION FOR LEAVE TO WITHDRAW

COMES NOW Mario B. Williams, of the law firm NDH LLC and counsel for
Defendants Nexus Services, Inc., Libre by Nexus, Inc., Micheal Donovan, Richard
Moore, and Evan Ajin (collectively, "Nexus") in this matter. In support whereof, the
following is shown.

1. Pursuant to Rule 1.16 of the Rules of Professional Conduct of the Virginia
State Bar, undersigned counsel is unable to continue to represent the
Defendants in this matter because of, amongst other reasons, irreconcilable
differences.

2. If the court deems necessary, even though Mr. Williams is in recovery from an operation, he will do his best to appear in order to discuss all matters and reasons for requesting leave to withdrawal.
3. Defendants have been notified of counsel's intention to withdraw but the services of substitute counsel have yet to be secured.
4. John Shoreman, co-counsel in this matter, is also moving to withdraw his appearance.
5. Defendants consent to the relief sought herein and represent that substitute counsel will enter an appearance following the pending hearing on the Motion to Dismiss.

WHEREFORE, Mario B. Williams, counsel for Defendants, respectfully moves this Court for entry of an Order permitting him to immediately withdraw as counsel of record in this case.

Submitted respectfully this 21st day of June 2021,

/s/ MARIO B. WILLIAMS
Mario B. Williams (VSB #91955)

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CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of June 2021, I have served a true and correct copy of the foregoing **MOTION FOR LEAVE TO WITHDRAW** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record, including:

<i>Attorneys for the Consumer Financial Protection Bureau</i> Hai Binh T. Nguyen Donald R. Gordon Kara K. Miller Email: haibinh.nguyen@cfpb.gov Email: donald.gordon@cfpb.gov Email: kara.miller@cfpb.gov	<i>Attorneys for the Commonwealth of Virginia, ex rel. Mark R. Herring, Attorney General</i> David B. Irvin Erin E. Witte Stephen J. Sovinsky Erin Boyd Ashwell Mark R. Herring Samuel Towell Email: dirvin@oag.state.va.us Email: ewitte@oag.state.va.us Email: ssovinsky@oag.state.va.us Email: eashwell@woodsrogers.com Email: mherring@oag.state.va.us Email: stowell@oag.state.va.us
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/s/ Mario B. Williams

Mario B. Williams (VSB #91955)